Summary of EPA's Technical Stakeholder Committee (TSC) Meeting #3
Yosemite Slough Site
July 24, 2012; EPA Offices; 75 Hawthorne Street, San Francisco, CA

Participants: See Attached Participant list.

Action Items

A. Incomplete Action Items from TSC Meeting #1 (all other action items from meeting #1 are complete)

- USF&WS will review requirements for dredge and fill material in SF Bay Projects and provide guidance to USEPA on this matter. Who: USF&WS (Whitlock)

B. Incomplete Action Items from TSC Meeting #2 (all other action items from meeting #2 are complete)

- EPA (Cooper) to provide written response to Gregg Douglass (Newfields Inc., consultant to the City of San Francisco) a letter concerning the PCB analytical method used for the EPA 2011 data report on Yosemite Slough. STATUS: Pending.

C. Action Items from TSC Meeting #3.

1. EPA to place all three technical studies final reports on the EPA Website for Yosemite Slough when they are ready. (Cooper, EPA)

2. EPA to obtain survey information to determine the site boundaries on the south, west, and northern edges of the Yosemite Slough Site in coordination with State Parks. Mean High Tide Line was suggested a possible site boundary line for the sediment portion of the site.

3. EPA to consider how ecological receptors will be protected under the remedy to be selected by the EECA. Factors include thickness of biological active zone in the slough sediments and locations where ecological receptor frequent (i.e. Slough banks and western, more shallow end of the Slough (Cooper/Black, EPA)

4. Investigate past invasive vegetation removal efforts (Spartina removal) and possible effects on sedimentation rates at the Slough. (Cooper, EPA)

5. Find examples where sediment caps of less than 3 feet that been found to provide long-term protectiveness (Cooper, EPA)

6. Consider the effectiveness of placing clean sand at the mouth of the Slough as a method to allow a thin layer cap to develop over the eastern portion of the Slough (All).

7. EPA to talk to Water Board about application of the 22 mg/kg limit for PCBs in Cal Park's permit and the risk of possible enforcement actions concerning the State Parks project area for exceedances in the case that EPA selects a higher PCB cleanup goal for Slough sediment.

8. Determine if State Parks has been designated as a resource trustee (EPA, State Parks)

9. Revise the Conceptual Site Model CSM to include a shore bird and replace the crayfish with a crab. Also consider developing separate high-tide and low-tide CSMs. (EPA)

Key Meeting Summary Notes

1. **Letter from City of SF consultant on PCB analytical methods.**
   EPA issued an addendum to its May 2011 data report on Yosemite Slough. The addendum data report is dated June 14, 2012 and is posted on EPA website. Although EPA estimates of total PCB concentrations in Slough sediments did not change, EPA's estimates of the individual concentrations of the Aroclor 1254 and 1260 concentrations did change at most sample locations and in some cases the chance was significant.

2. **Update on Derivation of Sediment Remediation Goals**
   EPA presented its remedial goals for PCBs and all other contaminants of concern at Yosemite Slough. EPA continues to believe that the remedial goal for total PCBs in Parcel F of 1,240 ppb (not to exceed) and 386 ppb residual weighted average sitewide will be protective of human health and environment at Yosemite Slough. USFWS continued to raise concerns that the PCB remedial goal may not be protective of the endangered Clapper Rail which may return to Yosemite Slough in the future. Protectiveness for the Green Sturgeon also a concern but not likely as important as the Clapper Rail. EPA will continue to discuss with the natural resource trustees EPA's rationale for these remedial goals and how protectiveness will be achieved when considering the remedial goals together with all components of the upcoming proposed cleanup action. It was stated that USFWS recently issued a Biological Opinion with a remedial goal of 90 ppb total PCB as being protective of the California Clapper Rail at a Salt Marsh Sediment Site located at the former Hamilton Air Force Base in Marin County.

3. **Endangered Species Act (ESA) Section 7 Consultation**
   EPA is the lead agency under CERCLA for the Yosemite Slough site and therefore EPA is responsible for documenting compliance with Section 7 of the ESA at this site. EPA's path forward, via the EECA process, is to make a final recommendation on site remedial goals and a proposed cleanup action. EPA will then assess if the proposed cleanup action is likely or unlikely to cause an adverse impact to threatened and endangered species at the Yosemite Slough site. At that point in the process, EPA will meet/discuss its recommendations with NOAA and USFWS to discuss appropriate next steps under ESA Section 7.

4. **Natural Resources Damages**
   USFWS stated that they were considering the applicability of pursuing a natural resources damage assessment and claim at Yosemite Slough. Their decision will be based on their internal assessment of potential resource damage and the scope/extent of Slough restoration activities contained in the EPA remedy. EPA stated that the Technical Stakeholder Committee is the not correct forum for discussions concerning potential natural resource damages and that USFWS should raise this issue with EPA legal counsel.

5. **2012 Technical Studies at the Slough**
   All three technical studies conducted earlier this year are now complete. These studies included EPA's Waste Characterization Study and PRP-lead Geotechnical study and Bench-scale dewatering treatability study which were conducted under EPA oversight. Summary presentations were

provided at the meeting and EPA will post each report on the EPA website. Key messages from each Study include:

- No RCRA or TSCA wastes in Slough sediments but high percent of California Hazardous Wastes likely due to leachable lead. EPA to research technical options and unit rates to treat leachable lead so off-site disposal costs are reduced.
- Dredging and capping are feasible at Yosemite Slough. A cofferdam at the Slough mouth for tidal control and turbidity control feasible but unlikely effective. Multiple zones of silt curtains likely better technique for turbidity control. Tidal control is not necessary if dredging in the wet is retained as a tool box option in the EECA.
- Effective technologies exist for dewatering of Slough sediments even young bay mud sediments. No onsite treatment of elutriate water needed if discharge to the City of SF sewer system selected in EECA.

6. Development of Removal Alternatives

EPA provided a detailed presentation on the screening of sediment cleanup technologies and formation of alternatives (cleanup options) for Yosemite Slough. See EPA presentation for details. EPA noted that a "multi-technology" approach would likely be best suited for a cleanup at Yosemite Slough.

7. Next Steps: Method to Develop Cleanup Alternatives for the EECA:

EPA and site PRPs will meet prior to TSC Meeting #4 to further discuss sediment remediation technologies and alternatives to be analyzed in the Yosemite Slough EECA. In late September 2012, EPA will then send a preliminary draft EECA for Tech Stakeholder Committee for internal review and comment. EPA will offer committee members a fourth and final meeting to go over committee membership comments on the preliminary draft EECA. Upon consideration of input from the Tech Stakeholder Committee, EPA will then issue the official draft EECA for public comment. EPA hopes to issue the final EECA by December 31, 2012.

8. Cultural resources compliance activities:

EPA completed cultural resources records search report for the Site. EPA will conduct formal consultation with Native American Stakeholders for San Francisco County as required under Section 106 of the National Historic Preservation Act.

9. EPA Community Involvement Plan (CIP):

EPA has completed CIP for the Yosemite Slough site and posted this document the EPA website.

10. EPA website for Yosemite Slough cleanup:

EPA has created a website for the Yosemite Slough Site: www.epa.gov/region09/YosemiteSlough . EPA will update the site and add documents/ information to this website on an ongoing basis.

11. Update on upland source control of contaminant risks:

EPA staff continued efforts to understand potential contamination threats to the Slough so reasonable and effective source controls efforts can be implemented to protect the future remedy at the Slough. Recent efforts included meetings and planning efforts with SFPUC, State Parks and State Lands Commission. EPA Superfund staff has also reached out to Water Board and EPA NPDES and stormwater staff.

12. Update on draft Best Case Project Schedule:

EPA's Draft Best Case Project Schedule continues to show the Slough cleanup to commence in the Summer of 2014. Many uncertainties and challenges threaten EPA ability to achieve this cleanup start date.